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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,
Plaintiffs,
v.
STANLEY TAYLOR, et al.,
Defendants.

C.A. No. 05-823-***

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT ROBERT MANUEL

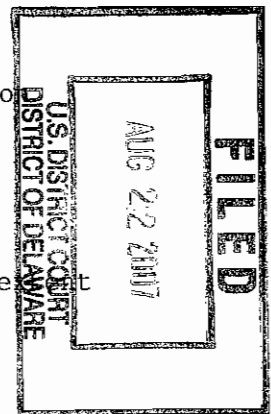
Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the extent
of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response to Plaintiffs' Interrogatories", and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?
4. Have you had a chance to meet and discuss the case with defendants' counsel?
5. Do you realize that you are under oath, just as if you were at trial testifying?
6. Is there any reason you can't give your best testimony today?



ROSMANUEL

7. Have you ever completed any accredited program on food safety, personal hygiene, preparation, cooking, proper cleaning and sanitizing before July 1, 2005? If yes, please state the name of the accredited program and the date of completion.

8. Do you agree or disagree. When a person is working under conditions that exhibits excessive heat and high humidity, a person body works at a much higher stress level due to the lack of oxygen in the air?

9. Since you have worked at the SCI kitchen, when an inmate complain of any illness, does the SCI food service staff diagnose the inmate worker, or is he refer to the medical unit to be examined by the proper authorized personnel?

10. In your "Response no. 2 to Plaintiffs' Interrogatories", you alleged that no inmate complain to you about the excessive heat and high humidity at the SCI kitchen. Have you witness excessive heat and high humidity during the days when numerous of ovens are being used to cook burgers, french fries or even fish?

11. Are you aware that on the back of the convectional ovens, there is a small plated sign which "warns" do not operate unless under a properly working ventilation hood system.

12. During the hot summer months when temperatures rise and/or exceeds 100 degree, what precautionary instructions are told to the kitchen inmates during these hot days?

13. Are you aware there are only one (1) toilet for 22-25 inmates workers to use, despite being told to drink plenty of liquid by SCI staff food service personnel.

14. Are you aware that inmate kitchen workers are force to wait longed periods to use the one (1) seat bathroom, and through the years some inmates have urinate in the drains of the trayrooms?

15. When inmate kitchen workers was housed in the air condition cool if they refused to work to work or get fired, would that inmate received a major disciplinary report (class I), and immediately moved to a lesser desireable housing unit?

GEORGE JACKSON
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